

EXHIBIT F

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September 25, 2009

VIA FACSIMILE 866-546-2547

AND U.S. MAIL

Mr. Charles LeMoine, Esq.
Mr. Daniel Noland, Esq.
Mr. Ryan Williams, Esq.
Dykema Gossett PLLC
10 S. Wacker Drive, Suite 2300
Chicago, IL 60606

Re: **Great West Casualty v. Volvo**
Case No.: 2008-CV-2872 (US District Court, No. Dist. of IL)
Our File No.: 20297-PJK

Dear Counsel:

We are writing with respect to your client's request that Great West provide Volvo certain stipulations which, if agreed to, would reduce the extent and scope of discovery necessary to be undertaken in this case. To that end, Great West proposes the following stipulations:

"Subject Truck" shall be deemed to mean Volvo model number VNL64T semi-tractor with vehicle identification number 4V4NC9GHX6N437372.

"Recall RVXX0601" shall be deemed to mean Volvo Safety Recall Notice RVXX0601 in which VNTA advised Volvo Truck Owners that it had decided that a defect, which relates to motor vehicle safety, exists in certain Volvo VHD, VNL, and VNM model vehicles with a Volvo D12 Engine from November 2002 through January 2006 and that these vehicles may be subject to a safety issue in the event that an Exhaust Gas Recirculation ("EGR") Cooler Pipe becomes damaged or loose.

1. VTNA received warranty claims related to Recall RVXX0601 with receipt dates ranging from August 29, 2003 through January 10, 2006.

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2. On October 24, 2005, Engine Product Development was contacted regarding inlet flange breaking at welds on the EGR cooler inlet pipes for certain Volvo truck models including Volvo VHD, VNL and VNM model vehicles manufactured with a Volvo D12 Engine.

3. On November 21, 2005, Regulatory Affairs group was contacted regarding a potential safety issue relating to the EGR cooler inlet pipes for certain Volvo truck models including Volvo VHD, VNL and VNM model vehicles manufactured with a Volvo D12 Engine and an investigation was opened.

4. On December 5, 2005, VNTA received a fire investigation assessment alleging that a fire started when the pipes that connect the EGR valve to the cooler became detached.

5. On _____, VNTA delivered the Subject Truck to LaBeau Bros. in Kankakee, Illinois. (Please advise of date that VTNA delivered Subject Truck to LaBeau Bros.)

6. On the date that VTNA delivered the Subject Truck to LaBeau Bros., the Subject Truck was in an unreasonably dangerous condition in that the Subject Truck was designed with a faulty and defective engine such that the EGR cooler inlet pipes and/or pipes that connect the EGR valves to the cooler may fail, which could leave to an engine fire for which VTNA is liable for strict products liability and negligence liability.

7. On January 4, 2006, Chicago Logistics took delivery of the Subject Truck from LaBeau Bros.

8. By January 4, 2006, VTNA had enough information about the EGR cooler valve leaks and the possibility of resulting engine compartment fires to issue a recall identical to Recall RVXX0601 which would have prevented LaBeau Bros from delivering an unrepaired, uninspected VNL64T tractor to Chicago Logistics on January 4, 2006.

9. On January 4, 2006, the Subject Truck was in an unreasonably dangerous condition in that the Subject Truck was sold and distributed with a defective engine such that the EGR cooler inlet pipes and/or pipes that connect the EGR valves to the cooler may fail, which could lead to an engine fire for which VTNA is liable for strict products liability and negligence liability.

10. The increased exhaust noise referenced in Recall RVXX0601 only occurs after the EGR cooler inlet pipes and/or the pipes that connect the EGR valves to the cooler have sustained a crack or break.

11. A crack or break in the EGR cooler inlet pipes and/or the pipes that connect the EGR valves to the cooler would not be visible to a driver performing a visual

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inspection until the increased exhaust sound referenced in Recall RVXX0601 is heard from the engine compartment.

12. There was no crack in the EGR cooler pipe that would have been visible to a truck driver such as Lorenzo Starks, before such time as the engine began making the increase exhaust sound referenced in recall RVXX0601.

13. On November 6, 2006, the Subject Truck was substantially destroyed as a result of a fire in the engine compartment.

14. The engine fire referenced in the Complaint and the resultant destruction to the Subject Truck was a direct and foreseeable result of the failure of the EGR cooler inlet pipes and/or the pipes that connect the EGR valves to the cooler having sustained a crack or break.

15. The engine fire referenced in the Complaint originated within the engine compartment of the Subject Truck on the right side of the engine in the vicinity of the rear EGR tube connecting the exhaust manifold to the EGR cooler.

16. The cause in fact of the engine fire referenced in the Complaint was due to a failure at the connection of the rear EGR tube to the EGR cooler inlet port, and a perforation that developed within the convoluted section of the EGR as it was deformed and perforated during the disconnect event.

17. As of November 6, 2006, the Subject Truck was in an unreasonably dangerous condition in that the Subject Truck was designed and manufactured with a faulty and defective engine such that the EGR cooler inlet pipes and/or pipes that connect the EGR valves to the cooler may fail which could lead to an engine fire for which VTNA is liable for strict products liability and negligence liability.

18. As of November 6, 2006, the Subject Truck was in an unreasonably dangerous condition in that the Truck was sold and distributed with a defective engine such that the EGR cooler inlet pipes and/or pipes that connect the EGR valves to the cooler may fail which could lead to an engine fire for which VTNA is liable for strict products liability and negligence liability.

19. VTNA will not assert as a defense or third party pleading to any of the causes of action asserted in the Complaint that it is not the proper party defendant to Great West's Strict Products Liability, Negligence and Breach of Written (Express) Warranty claims, not against Volvo Powertrain AB, Volvo Autotube, or any other entity responsible for designing and/or manufacturing any part of the Volvo D12 engine and the VNL 64T tractor at issue.

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Depending on your client's response to the above we are hopeful that we can achieve some agreement on the discovery necessary to conduct a trial on the remaining issues. As discovery is scheduled to close soon, we would appreciate a response at your earliest convenience so that motion practice is not necessary.

Very Truly Yours,

O'Hagan Spencer LLC


Patrick J. Keating *PK*


Luke P. Sheridan